

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION**

**DONALD J. TRUMP,**

**PLAINTIFF,**

**v.**

**CABLE NEWS NETWORK, INC.**

**DEFENDANT.**

**CASE NO. 0:22-cv-61842**

**MOTION TO APPEAR *PRO HAC VICE***

**MOTION TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of James M. Trusty of the law firm of IFRAH LAW, PLLC, 1717 Pennsylvania Avenue, NW, Suite 650, Washington, DC 20006, 202-852-5669, for purposes of appearance as co-counsel on behalf of Plaintiff Donald J. Trump in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit James M. Trusty to receive electronic filings in this case, and in support thereof states as follows:

1. James M. Trusty is not admitted to practice in the Southern District of Florida and is a member in good standing of the State Bar of Maryland and the Bar of the District of Columbia.
2. Movant, Lindsey Halligan, Esquire, 511 SE 5th Avenue, Fort Lauderdale, Florida 33301, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing

system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, James M. Trusty has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. James M. Trusty, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to James M. Trusty at email address: [jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com).

WHEREFORE, Movant, Lindsey Halligan, moves this Court to enter an Order admitting James M. Trusty, to appear before this Court on behalf of Plaintiff Donald J. Trump, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to James M. Trusty.

Date: October 3, 2022

Respectfully submitted,

/s/ Lindsey Halligan

Lindsey Halligan  
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*Counsel for Donald J. Trump*

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**CERTIFICATION OF JAMES M. TRUSTY**

James M. Trusty, Esquire, pursuant to Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of the State Bar of Maryland and the Bar of the District of Columbia; and (3) I have not filed three or more motions for pro hac vice admission in this District within the last 365 days.

/s/ James M. Trusty

James M. Trusty